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U.S. Department  
of Transportation

**National Highway  
Traffic Safety  
Administration**

DEPT. OF TRANSPORTATION  
DOCKET

02 JUL 25 AM 9:59

# Memorandum

*NHTSA-02-12316-2*

Subject: Petition for Import Eligibility  
Decision on 1999-2002 Mercedes Benz S Class (W220)  
Passenger Cars  
Date: JUN 4 2002

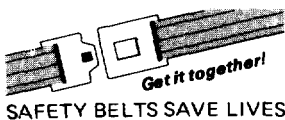
From: *[Signature]*  
Coreman Sachs  
Attorney  
Reply to  
Attn. of:

To: Docket Management

Please place the attached petition for a decision that  
nonconforming 1999-2002 Mercedes Benz SL Class (W220)  
passenger cars are eligible for importation in Docket No.  
NHTSA-2002-12316.

Attachment

#





automobile concepts inc, 13329 ne 17 ave n. miami, fl 33181 tel 305 893-1950 fax 305 893-9097

**Registered Importer 01-278**

**PETITION FOR IMPORT ELIGIBILITY DETERMINATION**

To:  
Administrator  
National Highway Traffic Safety Administration  
Room 6111  
400 7<sup>th</sup> Street SW  
Washington, DC, 20590  
Attn NEF-32 Import Eligibility

3-6-2002

*Dear Mr. Loy:*

*The following is the basis for this petition:*

**Part 593.6[a] [1]**

The vehicle for which a determination is sought is a 1999-2002 Mercedes Benz S-Class [W220].  
VIN# WDB2200701A065048.

We have examined the recall campaign and we have found that there are 2 pending:

1. Campaign ID 00V141000 Component: air conditioner electronic climate control module.
2. Campaign ID 01V014000 Component: visual systems windshield washer.

These existing and future Campaigns will be corrected and all necessary parts exchanged.

**Part 593.6 [a] [2]**

The vehicle which is substantially similar to the petition vehicle is the US version.

**Part 593.6 [a] [3]**

The vehicle which we believe to be substantially similar is manufactured for Sale in the USA and it was certified to meet all applicable FMVSS in effect at the time of manufacture. The non-conforming model was not listed on the accepted DOT list in 55 FR 219, pp 218, 47418ff, or the updates that have been published. A previous petition was approved for the 2000-2001 Mercedes Benz S 500 & S 600 [VSP 371]. The differences between the US model and the non-certified model are very minor and have been outlined in this petition.

**Part 593.6 [a] [4]**

Since a USA companion model exists, we seek your determination that our petition vehicle is substantially similar to the USA model and therefore is eligible for importation and modification in the 'substantially similar' category. We have examined the printed text from the dealers both in the USA and in Europe and we have compared the computerized parts list from Europe and the USA to determine both what differences exist and what parts will be necessary to bring our non-conforming model into conformance with all applicable FMVSS in effect at the time of manufacture. These differences and changes have been outlined in the following examination of each applicable FMVSS.

**Part 593.6 [a] [5]**

The following outline will show that our non-conforming vehicle was originally manufactured to conform to the FMVSS in many areas in the same manner as its US companion model, many of the concerned parts have the same parts numbers as the USA models. In all areas that have to be modified the parts will be supplied by the manufacturer. The modifications to this vehicle do not concern the basic structure, only easily removable and available parts.

**FMVSS 101**

Except as shown below, all controls and displays meet this FMVSS in the same manner as the USA model.

- a. The word "Brake" must be added to the dash in place of the international ECE warning symbol [Part # 220 584 04 17]
- b. The speedometer has to be reprogrammed and the face must show MPH, or the entire instrument cluster on these vehicles must be changed to the US part. [Part # 220 540 15 11 or 220 540 52 11]

**FMVSS 102**

The markings starter interlock, shifting pattern, and brake effect are identical to those in the US model.

**FMVSS 103**

The windshield defogging and defrosting systems are identical to those in the US model

**FMVSS 104**

The windshield wiping and washing systems are identical to those in the US model.

#### **FMVSS 105**

The hydraulic brake system and the parking brake system are identical to those in the US model.

#### **FMVSS 106**

The brake hoses are identical to those in the US model.

#### **FMVSS 108**

The following modifications must be made to fully meet The FMVSS:

- a. Install US model headlamps.  
[Part # 220 820 12 61 and 220 820 11 81]
- b. Install US model side marker.  
[Part \$ 220 820 01 21 and 220 820 02 21]
- c. Install US model tail lamp assemblies which incorporate rear side marker lights  
[Part \$ 220 820 06 64 and 220 820 05 64]
- d. Install US model high-mounted stop light assembly [if necessary]

#### **FMVSS 109**

This vehicle came equipped with tires that bear the "DOT" symbol.

#### **FMVSS 110**

A tire placard must be installed to meet this FMVSS requirement.

#### **FMVSS 111**

The driver's inside and outside rearview mirrors meet the FMVSS. However the passenger's Rearview outside mirror must be changed to the US companion model part to meet the Requirement or etched with the appropriate statement. [Part # 220 810 12 21]

#### **FMVSS 113**

The hood latch system is identical to the one used on the US model.

#### **FMVSS 114**

The vehicle must have the warning buzzer activated to meet this FMVSS

#### **CFR 565**

A "Vehicle identification Plate" must be added near the left windshield post and a reference And certification label must be added in the left front door post area to meet this FMVSS. Copies of all labels will be included in the final report.

#### **FMVSS 116**

The vehicle came equipped with DOT brake fluid and the top of the master cylinder with the DOT information

#### **FMVSS 118**

The power window system has to be reprogrammed so that the windows will not operate with the ignition off.

#### **FMVSS 124**

The acceleration control system is identical to the US model.

#### **FMVSS 135 [105]**

The hydraulic brake system and the parking brake system are identical to those in the US model.

#### **FMVSS 201**

The components subject to this FMVSS are identical to those in the US companion model. This model has been identified as meeting the upper interior head impact requirements by the manufacture. Each vehicle must be inspected to confirm that the appropriate parts are in place and any parts found to not bare the US parts must be replaced with US components.

#### **FMVSS 202**

This vehicle came equipped with head restraints that are identical to those on the US model.

#### **FMVSS 203**

N/A when FMVSS 208 is met. Conforms to S5.1 of FMVSS 208, Impact for steering controls systems.

#### **FMVSS 204**

The steering shaft on this vehicle are energy absorbing and is identical to that on the US model.

#### **FMVSS 205**

The glass and glazing material used on this vehicle are identical to those used on the US model. They are clearly labeled with DOT AS-1 or DOT AS-2.

#### **FMVSS 206**

The door locks and retention components are identical to the US model.

#### **FMVSS 207**

The seating system in this vehicle is identical to that used on the US model.

#### **FMVSS 208**

This vehicle is equipped with a seat belt warning lamp that is identical to that used on US Model. However, the warning buzzer must be reprogrammed.

The passive restraint system used in these vehicles consist of dual front airbags and knee Bolsters. They also have combination lap and shoulder belts at the out board front seating positions as well as at the rear outboard seating positions. These manual systems are automatic, self tensioning and are released by mean of a single red push-button.

All vehicles entering the USA must be inspected to confirm that the systems bear the US part # On the airbags [Part # 220 460 06 98 and 220 860 10 05], control unit [Part # 220 820 4+ 26], Sensors and seatbelts. Some parts coming from Europe countries may need to be changed due to varying regulations. However, Gulf states cars have US systems as standard equipment.

#### **FMVSS 209**

The seatbelt labels are identical to those on the US model and they meet this FMVSS requirement.

#### **FMVSS 210**

The seatbelt anchorages are identical to those on the US model.

#### **FMVSS 212**

The windshield intrusion zone and the parts are engineering thereof are identical to those of The US model

#### **FMVSS 214**

Doorbars in this vehicle are identical to those in the USA model. All vehicles that enter the Country must be inspected for compliance with this regulation due to varying Euro standards.

**49 CFR Part 581**

The bumpers and the support structure for the bumpers on these vehicles are identical to the US model.

**FMVSS 218**

The windshield intrusion and the parts or components thereof, are identical to those of the US model.

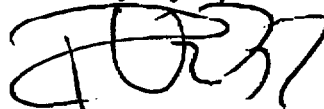
**FMVSS 301**

The fuel system in this vehicle is identical to that of the US model. Fuel spillage problems are controlled by the evaporative system that was installed by the factory for the EPA requirements. These evaporative systems have a rollover and check valve incorporated in their design.

**FMVSS 302**

This vehicle is equipped with interior materials that are identical to those used on the US model.

*Thank you for your attention*

A handwritten signature in black ink, appearing to read 'Ramez Wahab', written in a cursive style.

*Ramez Wahab*  
Automobile Concepts, Inc.